

REMARKS

The Final Office Action dated July 11, 2006 has been received and carefully noted. In the Final Office Action, amendments to the claims are objected to under 35 U.S.C. 132(a), claims 1, 7, and 13 were rejected under 35 U.S.C. 112, first and second paragraph and claims 1-20 were rejected under 35 U.S.C. §103(a). Independent claims 1, 7 and 13 have been revised. Applicants have respectfully traversed these rejections and request reconsideration of the allowability of claims 1-20.

I. Claims Rejected Under 35 U.S.C. § 132(a)

The Final Office Action asserts that the amendments introduce new matter into the disclosure. Applicants have amended the claims to clarify the claimed invention. This is supported in the original disclosure. Replacing the term “superset” with language using “directing” does not change the scope or add new matter. That is, Applicants’ claimed invention and original specification, beginning on page 12, line 8 -24 and page 14, line 9-18, clearly assert, for example, the translation of the absolute links involves links directed to more than one local domain.

Applicants have amended claims 1, 7 and 13 to overcome the 35 U.S.C. §132(a) objections. Accordingly, withdrawal of the 35 U.S.C. §132(a) objection is respectfully requested.

II. Claims Rejected Under 35 U.S.C. § 112

The Patent Examiner rejects claims 1, 7 and 13 under 35 U.S.C. § 112, first and second paragraph as failing to comply with the written description requirement and being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Claims 1, 7 and 13 have been amended with a phrase that comports with the disclosure on page 12 and page 14 in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time of the application was filed, had possession of the claimed invention. The limitation in these claims has been amended so that it is understood by one who is ordinary

skilled in the relevant art that the relationship between the absolute links and the corresponding relative link is such that the relative links are replaced by the absolute links so as to point to a local domain. These amendments are consistent with the original disclosure as noted above. Applicants respectfully submit that claims 1, 7 and 13 now complies with the written description requirement of 35 U.S.C. § 112 first paragraph.

Also, claims 1, 7 and 13 have been amended to point out and distinctly claim the subject matter of the invention. The word “superset” has been replaced by language that makes clear that the absolute links replace the corresponding links by adding the local domain names and thus direct each of the relative links to different local domains. Applicants respectfully submits that claims 1, 7 and 13 now particularly points out and distinctly claims the subject matter Applicants regard as the invention.

Applicant respectfully submits that all claims now particularly point out and distinctly claim the subject matter that Applicant regards as the invention and comply with the written description requirement. Accordingly, Applicant requests withdrawal of all rejections under 35 U.S.C. § 112.

III. Claims Rejected Under 35 U.S.C. § 103(a)

Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shah (U.S. Patent No. 6,292,832) in view of Still (U.S. Patent No. 6,718,390) and in further view of Beckerman (U.S. Patent No. 6,029,200). Applicants respectfully traverse the rejection because a *prima facie* case of obviousness has not been established.

As the Examiner is aware, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. *See MPEP §2143; see also In Re Fine, 873 F. 2d 1071, 5 U.S.P.Q.2D 1596 (Fed. Cir. 1988).* Herein, the combined teachings of the cited references fail to describe or suggest all of the claim limitations.

For instance, as set forth in independent claims 1 and 7, Applicants respectfully submit that neither Shah, Still nor Beckerman alone or in combination, teach or suggest the translation of a plurality of *relative links* into a corresponding plurality of *absolute links* that...point to the *local domains associated with at least two* of the plurality of personal content directors. *Emphasis added.*

Applicants agree that Shah does not teach that the data includes a plurality of relative links and the translating operation. *See page 4 of the Office Action.* While using round trip time (“RTT”) as a metric for choosing the “best” service, Shah obtains the RTT using the “approximate client’s location”. (Col 11, line 24-25). Even in the embodiment described in FIG. 14, Shah approximates the RTT by sending a round trip probe to the local domain name server and not to the client. (Col 15, line 47-49). Thus, unlike claims 1 and 7, Shah uses approximate values to calculate proximity of the client. Shah does not teach all elements of claim 1 and 7. This defect is not cured by Still.

Column 4, lines 58-63 of Still describes a server proxy (210) that intercepts a HTML result, namely one or more HTML pages recovered from a resource (216) in communication with server (208), and scans the HTML result to identify references (e.g., hyperlink) to resources hosted by the server (208). If any references are found, they are modified to refer to a single server (206) or server proxy (210). This teaches that the translation of the relative links to absolute links is for retaining control over the communication with the client. The Examiner has not relied upon and the Applicant has been unable to discern in any part of Still that discloses a method to determine a most proximate local domain for a client based on subsequent access to download data accessible through absolute links.

Applicants also agree that Beckerman teaches a system that takes a hyperlink and responds with absolute links in form of a reference file. *See page 5 of the Office Action.* Beckerman is directed to teaching of the supply of multiple links for the same resource, which is inconsistent with the claimed invention where the absolute links are used for determining a most proximate local domain for a client on subsequent accesses to download data accessible through absolute links.

Hence, the combined teachings of Shah, Still and Beckerman are directed to a process where links are modified to absolute links associated with a single local domain, which is contrary to the claimed invention. In fact, Applicants respectfully submit that the combination of both Shah, Still and Beckerman teaches away from the claimed invention in which the communications are focused to a centralized server (e.g., distributed director 506, server 206/210) and are not directed to modification of the relative links to absolute links involving at least two local domains as claimed.

With respect to independent claim 13, Applicants respectfully submit that neither Shah, Still nor Beckerman, alone or in combination, teach or suggest a *personal content director (PCD)* of the at least two PCDs that is adapted to translate the relative links associated with the web page into *corresponding absolute links that uniquely point to local domains associated with both of the at least two PCDS*. *Emphasis added.*

Applicants respectfully request that the Examiner withdraw the outstanding 35 U.S.C. §103(a) rejection as applied to independent claims 1, 7 and 13.

Furthermore, based on the dependency of claims 2-6, 8-12 and 14-20 on independent claims 1, 7 and 13, which are believed by Applicants to be in condition for allowance, no further discussion as to the grounds for traverse is warranted. Applicants reserve the right to present such arguments in an Appeal is warranted. Withdrawal of the §103(a) rejection as applied to claims 2-6, 8-12 and 14-20 is respectfully requested.

CONCLUSION

In view of the remarks made above, it is respectfully submitted that pending claims 1-20 define the subject invention over the prior art of record. Thus, Applicants respectfully submit that all the pending claims are in condition for allowance, and such action is earnestly solicited at the earliest possible date.

Respectfully submitted,

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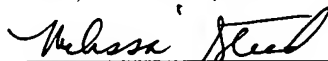

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